

Morin Brick Company)	Departmental
Androscoggin County)	Findings of Fact and Order
Auburn, Maine)	Part 70 Air Emission License
A-209-70-A-I)	

After review of the Initial Part 70 License application, staff investigation reports and other documents in the applicant's file in the Bureau of Air Quality, pursuant to 38 M.R.S.A., Section 344 and 590, the Department finds the following facts:

I. REGISTRATION

A. Introduction

FACILITY	Morin Brick Company
LICENSE NUMBER	A-209-70-A-I
LICENSE TYPE	Initial Part 70 License
SIC CODES	3251
NATURE OF BUSINESS	Brick & Structural Clay Products
FACILITY LOCATION	Old Danville Road, Auburn
DATE OF LICENSE ISSUANCE	
LICENSE EXPIRATION DATE	

B. Emission Equipment

The following emission units are addressed by this Part 70 License:

EMISSION UNIT ID	UNIT CAPACITY	UNIT TYPE
Brick Kiln, 1K	9.67 MMBtu/hr; 10,733 lb/hr	Process equipment
Brick Dryer, 1BD	13,067 lb/hr	Process equipment
Batch Brick Dryer, 2BD	1.4 MMBtu/hr; 25,000 lb/hr	Process equipment

Morin Brick Company has additional insignificant activities which do not need to be listed in the emission equipment table above.

C. Application Classification

The application for Morin Brick Company does not include the licensing of increased emissions or the installation of new or modified equipment, therefore the license is considered to be an Initial Part 70 License issued under Chapter 140 for a Part 70 source.

II. EMISSION UNIT DESCRIPTION

A. Process Description

Morin Brick Company manufactures brick using two separate processes, stiff mud extrusion and a water struck process.

Clay is obtained from a mine in the vicinity of the brick manufacturing plant and is delivered to the site via dump trucks. The raw clay is unloaded at the extruded grinding area and is fed into a hopper which regulates the flow of clay into a disintegrating crusher (25 ton per hour capacity) where the clay is initially sized. The clay exits the crusher and is conveyed to a second disintegrating crusher (25 ton per hour capacity) where the clay size is further reduced. After exiting the second crusher, the clay is conveyed to a pug mill where it is mixed with lime, sand, or water, depending on the consistency of the clay. Additives including manganese dioxide and barium carbonate may be mixed in the clay at the pug mill to obtain different color schemes in the fired brick. The mixed clay is then discharged to a vacuum chamber to remove air from the material which is extruded through dies where brick are formed by stiff mud extrusion. Approximately 1825 gallons per year of #2 fuel oil or specification waste oil is used as a lubricant during the extrusion of the brick column through the dies. VOC emission attributable to fuel oil used during extrusion account for 6.4 tons VOC per year. After the extrusion process, the column is wire cut into bricks which are then hand set onto kiln cars.

Once loaded, the kiln cars enter the brick dryer where moisture is driven out of the brick body. The dryer is heated by waste heat from the cooling zone of the brick kiln and maintains a temperature of approximately 350°F. The supply of heated air from the cooling zone is controlled by a series of mechanical dampers, which limit the introduction of products of combustion from the kiln firing area into the dryer.

After approximately 24 hours in the brick dryer, the kiln cars are loaded into the brick kiln. Morin Brick Company utilizes a tunnel kiln, which consists of three separate areas, the preheat zone, the firing zone, and the cooling zone. In the preheat zone, propane or natural gas is combusted to create the required temperature gradient prior to firing the brick and for drafting purposes. A process called flashing, used to add color to the fired brick, is also conducted in the preheat zone. During flashing, an excess amount of fuel (propane or natural gas) is introduced into the kiln, producing reducing conditions. Flashing does not occur for more than 8 minutes in any given hour. The firing zone is equipped with 50 burners (five groups of ten burners each) firing natural gas or propane with a combined firing capacity of 7612 cubic feet of natural gas per hour. A temperature of 1975°F to 2050°F is typically maintained in the firing zone.

After leaving the firing zone, the kiln cars enter the cooling zone where the bricks are slowly cooled to prevent breaking. An air supply fan is located at the end of the cooling zone, which forces outside air over the cooling bricks. A portion of the heated air is then ducted to either the brick dryer or the batch dryer. The remaining air flows in to the firing zone and is exhausted through the kiln stack. Once cooled the brick exit the kiln and are packages for shipping. The entire firing/cooling process generally lasts for 36 hours.

In addition to stiff mud extrusion, bricks are manufactured using a soft mud or water struck process. Raw clay is fed into a pug mill where it is mixed with water. The clay is then fed into a disintegrating crusher (20 ton per hour capacity) along with sand. After exiting the crusher, the clay/sand mixture is conveyed to a pug mill where it is mixed with water to a moisture content between 34 and 36 percent. Additives may be mixed in to obtain different color schemes in the fired brick. The resulting clay slurry is then placed in molds which are initially dried in the batch dryer. Heat to the batch dryer is provided by waste heat from the kiln and an auxiliary boiler with a maximum design firing rate of 1.4 MMBtu/hr. After preliminary drying in the batch dryer the bricks are removed from the molds, placed on kiln cars, sent to the brick dryer, and then are fired in the kiln.

Emissions from the kiln result from both fuel combustion and liberation/conversion of material in the brick body. Emissions from the brick body are typically sulfur dioxide and hydrogen fluoride. Emissions from the brick dryer result from the volatilization of the distillate oil used for brick extrusion.

B. Brick Kiln

Unit Size and Age

The brick kiln was manufactured by Lingl Corporation in 1979 and is equipped with 50 burners (five groups of ten burners each). Each burner is a Lingl Corporation and North American Model with a total combined maximum firing rate of 7612 cubic feet of natural gas per hour. The kiln has a total maximum heat input capacity of 9.67 MMBtu/hr. The raw material process rate through the kiln is 10,733 lb/hr, and the finished material rate is 10,500 lb/hr.

Streamlining

Opacity

Morin Brick Company accepts streamlining for opacity requirements. Chapter 101, Section 2 (C) is applicable; however, the Best Practical Treatment (BPT) opacity limit in this license is more stringent.

Particulate Matter

Morin Brick Company accepts streamlining for particulate matter requirements. Chapter 105 is applicable; however, the Best Practical Treatment (BPT) particulate matter limit in this license is more stringent.

Periodic Monitoring

Periodic monitoring shall consist of recordkeeping which includes records of brick throughput, brick additives, and fuel use through purchase receipts indicating amount (scf or gallons) and percent sulfur by weight.

C. Brick Dryer

The brick dryer was manufactured by Lingl Corporation in 1979. The brick dryer will also emit products of combustion from the brick kiln. The green brick process rate input to the dryer is 13,067 lb/hr, and the dried brick output is 10,733 lb/hr.

Streamlining

Opacity

Morin Brick Company accepts streamlining for opacity requirements. Chapter 101, Section 2 (C) is applicable; however, the Best Practical Treatment (BPT) opacity limit in this license is more stringent.

Particulate Matter

Morin Brick Company accepts streamlining for Chapter 105 particulate matter requirements. Chapter 105, Section 2 is applicable to the brick dryer. However, compliance with the opacity limit will always mean that the facility is in compliance with Chapter 105.

Periodic Monitoring

Periodic monitoring shall consist of recordkeeping which includes records of brick throughput.

Based on raw material moisture content, there is no reasonable likelihood of the brick dryer to exceed the opacity limits. Therefore, periodic monitoring for opacity in the form of visible emissions is not required. However, neither the EPA nor the State is precluded from performing its own testing and may take enforcement action for any violations discovered.

D. Batch Dryer

The batch dryer was manufactured by Pixley Ceriv in 1987 and is equipped with one Multifire III burner. The burner was manufactured by Maxon Burner Corporation with a maximum design heat input capacity of 1.4 MMBtu/hr. The batch dryer will also emit products of combustion from the kiln. The batch dryer fires natural gas or propane. The molded brick process rate input to the dryer is 25,000 lb/hr and molded brick output rate is approximately 25,000 lb/hr.

Streamlining

Opacity

Morin Brick Company accepts streamlining for opacity requirements. Chapter 101, Section 2(C) is applicable; however, the Best Practical Treatment (BPT) opacity limit in this license is more stringent.

Particulate Matter

Morin Brick Company accepts streamlining for particulate matter requirements. Chapter 105 is applicable; however, the Best Practical Treatment (BPT) particulate matter limit in this license is more stringent.

Periodic Monitoring

Periodic monitoring shall consist of recordkeeping which includes records of brick throughput and fuel use through purchase receipts indicating amount (scf or gallons) and percent sulfur by weight.

E. Fugitive Emissions

Fugitive particulate matter emissions sources at Morin Brick include material stockpiles, paved and unpaved surfaces.

Periodic Monitoring

Based on best management practices and wetting roads and storage piles with water when appropriate, there is no reasonable likelihood of the fugitive emission sources to exceed the opacity limits. Therefore, periodic monitoring for opacity in the form of visible emissions is not required. However, neither the EPA nor the State is precluded from performing its own testing and may take enforcement action for any violations discovered.

F. Miscellaneous Emission Units

Small emission units include the following: one oil furnace and two propane/kerosene heaters less than 1 MMBtu/hr, grinding and crushing operations for the raw materials, and primary crushers used to process the raw materials.

Streamlining

Opacity

Morin Brick Company accepts streamlining for opacity requirements. Chapter 101, Section 2(A)(1) is applicable to the furnace and heaters, and Chapter 101, Section 2(B) is applicable to the primary crushers and grinding and crushing operations. However, the Best Practical Treatment (BPT) opacity limits in this license are more stringent.

Particulate Matter

Morin Brick Company accepts streamlining for Chapter 105 particulate matter requirements. Chapter 105, Section 2 is applicable to the primary crushers and

grinding and crushing operations. However, compliance with the opacity limits will always mean that the facility is in compliance with Chapter 105.

Periodic Monitoring

The primary crushers and the grinding and crushing operations are used for processing the raw material including clay. Based on the high moisture content of the clay, visible emissions are not expected from these processes.

Periodic monitoring is not necessary due to their inherent ability to comply with the opacity standards.

G. Facility Emissions

Total Allowable Annual Emissions for the Facility*

(Used to calculate the annual license fee)

<u>Pollutant</u>	<u>TPY</u>
PM	24.9
PM ₁₀	24.9
SO ₂	18
NO _x	15
CO	36
VOC	7.7
HF	27.6

* Total facility emissions do not include emissions from insignificant activities or units designated as miscellaneous emission units.

III. AIR QUALITY ANALYSIS

According to the Maine Air Regulations Chapter 140, an existing Part 70 source shall be exempt from an impact analysis with respect to a regulated pollutant whose allowable emissions do not exceed the following:

<u>Pollutant</u>	<u>TPY</u>
PM	25
PM ₁₀	25
SO ₂	50
NO _x	100
CO	250

Based on facility license allowed emissions, Morin Brick Company is below the emissions level required for modeling and monitoring.

ORDER

Based on the above Findings and subject to conditions listed below the Department concludes that the emissions from this source:

- will receive Best Practical Treatment,
- will not violate applicable emission standards,
- will not violate applicable ambient air quality standards in conjunction with emissions from other sources.

The Department hereby grants the Part 70 License A-209-70-A-I, subject to the following conditions:

For each standard and special condition which is State Enforceable only, State-only Enforceability is designated with the following statement: **Enforceable by State-only**

STANDARD CONDITIONS

- (1) Employees and authorized representatives of the Department shall be allowed access to the licensee's premises during business hour, or any time during which any emissions units are in operation, and at such other times as the Department deems necessary for the purpose of performing tests, collecting samples, conducting inspections, or examining and copy records relating to emission and this license;
- (2) The licensee shall acquire a new or amended air emission license prior to commencing construction of a modification, unless specifically provided for in Chapter 140;
- (3) Approval to construct shall become invalid if the source has not commenced construction within eighteen (18) months after receipt of such approval or if construction is discontinued for a period of eighteen (18) months or more. The Department may extend this time period upon a satisfactory showing that an extension is justified, but may condition such extension upon a review of either the control technology analysis or the ambient air quality standards analysis, or both;
- (4) The licensee shall establish and maintain a continuing program of best management practices for suppression of fugitive particulate matter during any period of construction, reconstruction, or operation which may result in fugitive

- dust, and shall submit a description of the program to the Department upon request; **Enforceable by State-only**
- (5) The licensee shall pay the annual air emission license fee to the Department, calculated pursuant to Title 38 MRSA §353.
- (6) The Part 70 license does not convey any property rights of any sort, or any exclusive privilege;
- (7) The licensee shall maintain and operate all emission units and air pollution control systems required by the air emission license in a manner consistent with good air pollution control practice for minimizing emissions; **Enforceable by State-only**
- (8) The licensee shall maintain sufficient records, to accurately document compliance with emission standards and license conditions and shall maintain such records for a minimum of six (6) years. The records shall be submitted to the Department upon written request or in accordance with other provisions of this license;
- (9) The licensee shall comply with all terms and conditions of the air emission license. The submission of notice and intent to reopen for cause by the Department, the filing of an appeal by the licensee, the notification of planned changes or anticipated noncompliance by the licensee, or the filing of an application by the licensee for the renewal of a Part 70 license or amendment shall not stay any condition of the Part 70 license.
- (10) All terms and conditions are enforceable by EPA and citizens under the CAA unless specifically designated as state enforceable.
- (11) The licensee may not use as a defense in an enforcement action that the disruption, cessation, or reduction of licensed operations would have been necessary in order to maintain compliance with the conditions of the air emission license;
- (12) In accordance with the Department's air emission license test protocol and 40 CFR Part 60 or other method approved or required by the Department, the licensee shall:
- (a) perform stack testing under circumstances representative of the facility's normal process and operating conditions:
- (i) within sixty (60) calendar days of receipt of a notification to test from the Department or EPA, if visible emissions, equipment operating parameters, staff investigation, air monitoring or other cause indicate to the

Department that equipment may be operating out of compliance with emission standards or license conditions;

(ii) to demonstrate compliance with the applicable emission standards; or

(iii) pursuant to any other requirement of this license to perform stack testing.

(b) install or make provisions to install test ports that meet the criteria of 40 CFR Part 60, Appendix A, and test platforms, if necessary, and other accommodations necessary to allow emission testing; and

(c) submit a written report to the Department within thirty (30) days from date of test completion.

Enforceable by State-only

(13) If the results of a stack test performed under circumstances representative of the facility's normal process and operating conditions indicates emissions in excess of the applicable standards, then:

(a) within thirty (30) days following receipt of such test results, the licensee shall re-test the non-complying emission source under circumstances representative of the facility's normal process and operating conditions and in accordance with the Department's air emission compliance test protocol and 40 CFR Part 60 or other method approved or required by the Department; and

(b) the days of violation shall be presumed to include the date and stack test and each and every day of operation thereafter until compliance is demonstrated under normal and representative process and operation conditions, except to the extent that the facility can prove to the satisfaction of the Department that there where intervening days during which no violation occurred or that the violation was not continuing in nature; and

(c) the licensee may, upon the approval of the Department following the successful demonstration of compliance at alternative load conditions, operate under such alternative load conditions on an interim basis prior to a demonstration of compliance under normal and representative process and operating conditions.

Enforceable by State-only

(14) Notwithstanding any other provision in the State Implementation Plan approved by the EPA or Section 114(a) of the CAA, any credible evidence may be used for the purpose of establishing whether a person has violated or is in violation of any statute, regulation, or Part 70 license requirement.

(15) Compliance with the conditions of this Part 70 license shall be deemed compliance with any Applicable requirement as of the date of license issuance and is deemed a permit shield, provided that:

(a) such Applicable and state requirements are included and are specifically identified in the Part 70 license, except where the Part 70 license term or condition is specifically identified as not having a permit shield; or

(b) the Department, in acting on the Part 70 license application or revision, determines in writing that other requirements specifically identified are not applicable to the source, and the Part 70 license includes the determination or a concise summary, thereof.

Nothing in this section of any Part 70 license shall alter or effect the provisions of Section 303 of the CAA (emergency orders), including the authority of EPA under Section 303; the liability of an owner or operator of a source for any violation of Applicable requirements prior to or at the time of permit issuance; or the ability of EPA to obtain information from a source pursuant to section 114 of the CAA.

(16) The licensee shall retain records of all required monitoring data and support information for a period of at least six (6) years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by the Part 70 license.

(17) The licensee shall maintain records of all deviations from license requirements. Such deviations shall include, but are not limited to malfunctions, failures, downtime, and any other similar change in operation of air pollution control systems or the emission unit itself that is not consistent with the terms and conditions of the air emission license. The licensee shall notify the Department within two (2) days of the next working day, whichever is later, of such occasions and shall report that probable cause, corrective action, and any excess emissions in the units of the applicable emission limitation;

(18) Upon the written request of the Department, the licensee shall establish and maintain such records, make such reports, install, use, and maintain such monitoring equipment, sample such emissions (in accordance with such methods, at such locations, at such intervals, and in such manner as the Department shall prescribe), and provide other information as the Department may reasonably require to determine the licensee's compliance status.

- (19) The licensee shall submit quarterly reports of any required monitoring as required by the Department. All instances of deviations from Part 70 license requirements must be clearly identified in such reports. All required reports must be certified by a responsible official.
- (20) The licensee shall submit a compliance certification to the Department and EPA at least annually, or more frequently if specified in the Applicable requirement or by the Department. The compliance certification shall include the following:
- (a) the identification of each term or condition of the Part 70 license that is the basis of the certification;
 - (b) the compliance status;
 - (c) whether compliance was continuous or intermittent;
 - (d) the method(s) used for determining the compliance status of the source, currently and over the reporting period; and
 - (e) such other facts as the Department may require to determine the compliance status of the source;
- (21) The Part 70 license shall be reopened for cause by the Department or EPA, prior to the expiration of the Part 70 license, if:
- (a) Additional Applicable requirements under the CAA become applicable to the Part 70 major source with a remaining Part 70 license term of 3 or more years. However, no opening is required if the effective date of the requirement is later than the date on which the Part 70 license is due to expire, unless the original Part 70 license or any of its terms and conditions has been extended pursuant to Chapter 140;
 - (b) Additional requirements (including excess emissions requirements) become applicable to the Title IV source under the acid rain program. Upon approval by EPA, excess emissions offset plans shall be deemed to be incorporated into the Part 70 license;
 - (c) The Department or EPA determines that the Part 70 license contains a material mistake or that inaccurate statements were made in establishing the emission standards or other terms of conditions of the Part 70 license; or
 - (d) The Department or EPA determines that the Part 70 license must be revised or revoked to assure compliance with the Applicable requirements.

The licensee shall furnish to the Department within a reasonable time any information that the Department may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the Part 70 license or to determine compliance with the Part 70 license.

- (22) No license revision or amendment shall be required, under any approved economic incentives, marketable licenses, emissions trading or other similar programs or processes for changes that are provided for in the Part 70 license.

SPECIAL CONDITIONS

- (23) Permit Shield for Non-Applicable Requirements

The following requirements have been specifically identified as not applicable based upon information submitted by the licensee in application dated October 28, 1996.

SOURCE		CITATION	DESCRIPTION	BASIS FOR DETERMINATION
Primary crushers	a.	40 CFR Part 60 Subpart OOO	Standards of Performance for Non-metallic Minerals Processing	Crushers were installed before and have not been modified since August 31, 1983
facility	b.	112(r)	Accidental Release Prevention	Large propane storage tank on site is not under Morin Brick's control and is not owned by Morin Brick

- (24) Brick Kiln

- A. The brick kiln shall not exceed a heat input rate of 9.67 MMBtu/hr of propane and natural gas. [MEDEP Chapter 140, BPT] **Enforceable by State-only**
- B. Flashing in the brick kiln shall be limited to 20 gallons per hour for propane and 1,777 cubic feet per hour for natural gas. [MEDEP Chapter 140, BPT] **Enforceable by State-only**
- C. The brick kiln shall be limited to firing natural gas and propane. [MEDEP Chapter 140, BPT] **Enforceable by State-only**

D. Emissions from the brick kiln shall not exceed the following limits:

Pollutant	Lb/hr	Origin and Authority	Enforceability
PM	5.1	MEDEP Chapter 140, BPT	-
PM ₁₀	4.6	MEDEP Chapter 140, BPT	Enforceable by State-only
SO ₂	3.5	MEDEP Chapter 140, BPT	Enforceable by State-only
NO _x	3.5	MEDEP Chapter 140, BPT	Enforceable by State-only
CO	6.4	MEDEP Chapter 140, BPT	Enforceable by State-only
VOC	7.8	MEDEP Chapter 140, BPT	Enforceable by State-only
HF	6.3	MEDEP Chapter 140, BPT	Enforceable by State-only

E. Morin Brick Company shall operate the brick kiln such that the visible emissions from the kiln do not exceed an opacity of 20 percent on a six (6) minute block average basis, for more than one (1) six (6) minute block average in a 1-hour period. [MEDEP Chapter 140, BPT]

F. When requested by the Department, Morin Brick Company shall conduct visible emission testing on the brick kiln in accordance with 40 CFR Part 60, Appendix A, Method 9 or other method approved by the Department. [MEDEP Chapter 140, BPT]

G. Morin Brick Company shall maintain monthly records of brick additives (including manganese dioxide) indicating amount of additive purchased and weight percent HAP. [MEDEP Chapter 140, BPT]

(25) Morin Brick Company shall not exceed an annual (12-month rolling total) brick production limit of 45,900 tons per year. Morin Brick Company shall maintain records of monthly brick throughput. [MEDEP Chapter 140, BPT] **Enforceable by State-only**

(26) Brick Dryer

A. Morin Brick Company shall operate the brick dryer such that the visible emissions from the dryer do not exceed an opacity of 10 percent on a six (6) minute block average basis, for more than one (1) six (6) minute block average in a 1-hour period. [MEDEP Chapter 140, BPT]

B. VOC emissions from the brick dryer shall not exceed 1.6 lb/hr. [MEDEP Chapter 140, BPT] **Enforceable by State-only**

(27) Batch Dryer

A. The batch dryer shall not exceed a heat input rate of 1.4 MMBtu/hr of natural gas and propane demonstrated by the fuel firing rate into the batch dryer. [MEDEP Chapter 140, BPT] **Enforceable by State-only**

B. The batch dryer shall be limited to firing natural gas and propane. [MEDEP Chapter 140, BPT] **Enforceable by State-only**

C. Emissions from the batch dryer shall not exceed the following limits:

Pollutant	Lb/hr	Origin and Authority	Enforceability
PM	3.0	MEDEP Chapter 140, BPT	-
PM ₁₀	3.0	MEDEP Chapter 140, BPT	Enforceable by State-only
SO ₂	0.1	MEDEP Chapter 140, BPT	Enforceable by State-only
NO _x	0.51	MEDEP Chapter 140, BPT	Enforceable by State-only
CO	1.63	MEDEP Chapter 140, BPT	Enforceable by State-only
VOC	0.16	MEDEP Chapter 140, BPT	Enforceable by State-only

D. Morin Brick Company shall operate the batch dryer such that the visible emissions from the dryer do not exceed an opacity of 20 percent on a six (6) minute block average basis, for more than one (1) six (6) minute block average in a 1-hour period. [MEDEP Chapter 140, BPT]

E. When requested by the Department, Morin Brick Company shall conduct visible emission testing on the batch dryer in accordance with 40 CFR Part 60, Appendix A, Method 9 or other method approved by the Department. [MEDEP Chapter 140, BPT]

(28) Facility Fuel Use

A. For the fuel oil utilized as a lubricant during the extrusion of the brick column through the dies, Morin Brick Company shall not exceed an annual distillate fuel (including #2 fuel oil and specification waste oil) use cap of 2,000 gallons per year (12-month rolling total) demonstrated by purchase records from the supplier. [MEDEP Chapter 140, BPT] **Enforceable by State-only**

i. The sulfur content of the distillate fuel shall not exceed 0.5% by weight demonstrated by purchase records from the supplier. [MEDEP Chapter 140, BPT]

B. Morin Brick Company shall not exceed an annual propane use cap of 400,000 gallons per year (12 month rolling total) demonstrated by purchase records from the supplier. [MEDEP Chapter 140, BPT] **Enforceable by State-only**

C. Morin Brick Company shall not exceed an annual natural gas use cap of 85.15 million cubic feet per year (12 month rolling total) demonstrated by purchase records from the supplier. [MEDEP Chapter 140, BPT] **Enforceable by State-only**

D. Morin Brick Company shall maintain records of monthly distillate fuel oil (including #2 fuel oil and specification waste oil), natural gas, and propane

use indicating the quantity of fuel consumed, the sulfur content, and the heat content of the fuel. [MEDEP Chapter 140, BPT]

(29) Specification Waste Oil

A. The waste oil to be utilized shall meet the criteria for Specification Waste Oil:

Specification Waste Oil: Waste oil which shall not exceed all of the following standards, which does not otherwise exhibit hazardous waste characteristics, and which has not been mixed with hazardous waste.

<u>Constituent/Property</u>	<u>Allowable Level*</u>
Arsenic	5.0 ppm maximum
Cadmium	2.0 ppm maximum
Chromium	10 ppm maximum
Lead	100 ppm maximum
Polychlorinated Biphenyls (PCBs)	10 ppm maximum
Total Halogens	1,000 ppm maximum
Flash Point	100°F minimum

* Concentrations are in parts per million on a dry weight basis, values for metals are for total metal concentration, not EP Toxic concentration.

B. Morin Brick Company shall maintain records of a representative sample of the waste oil utilized demonstrating that the waste oil meets the allowable level for the above constituents and property.

C. Purchase receipts shall be kept documenting the quantity and type of waste oil utilized in the brick extrusion process and the receipts shall be made available to the Department upon request.

[MEDEP Chapter 140, BPT] **Enforceable by State-only**

(30) Morin Brick Company shall not exceed the following annual emission limits on a 12-month rolling total basis:

<u><i>Pollutant</i></u>	<u><i>TPY</i></u>	<u><i>Origin and Authority</i></u>
PM	24.9	MEDEP Chapter 140, BPT
PM ₁₀	24.9	MEDEP Chapter 140, BPT
SO ₂	18	MEDEP Chapter 140, BPT
NO _x	15	MEDEP Chapter 140, BPT
CO	36	MEDEP Chapter 140, BPT
VOC	7.7	MEDEP Chapter 140, BPT
HF	27.6	MEDEP Chapter 140, BPT

Enforceable by State-only

(31) Fugitive Emissions

- A. Potential sources of fugitive PM emissions including material stockpiles, paved, and unpaved roadways shall be controlled when appropriate by wetting with water, with calcium chloride, or other methods as approved by the Bureau of Air Quality to prevent visible emissions in exceed of 10% opacity on a three (3) minute block average basis. [MEDEP Chapter 140, BPT]
- B. When visible emissions from the clay pile exceed 10 percent opacity, Morin Brick Company shall wet the storage pile to reduce fugitive particulate matter emissions. [MEDEP Chapter 140, BPT] **Enforceable by State-only**

(32) Semi-Annual Reporting

- A. The licensee shall submit reports to the Bureau of Air Quality within 45 days from the end of each six month reporting period, ending December 31 and June 30 of each year, detailing the following:
 1. A summary report of the recordkeeping indicating: gallons of #2 fuel oil and specification waste oil utilized as a lubricant including the percent sulfur by weight, natural gas and propane (scf/ gallon) utilized including sulfur content and heat content (12 month rolling total), brick throughput (12 month rolling total), and pound or gallons of brick additives including percentage HAP by weight.
 2. All instances of deviations from license requirements must be identifies and stated.

[MEDEP Chapter 140]

- (33) The licensee shall annually report to the Department, in a specified format, fuel use, operating rates, use of materials and other information necessary to accurately update the State's emissions inventory. [MEDEP Chapter 137]
Enforceable by State-only

(34) Miscellaneous Emission Units

Emission Unit	Origin and Authority	Requirement Summary
Oil furnace & 2 propane/ kerosene heaters <1 MMBtu/hr	Chapter 140, BPT	Visible emissions shall not exceed an opacity of 30 percent on a six (6) minute block average basis, for more than two (2) six (6) minute block averages in a 3-hour period
Grinding and Crushing	Chapter 140, BPT	Visible emissions from crushing and grinding operations shall not exceed 0% opacity on a three (3) minute block average basis
Primary Crushers	Chapter 140, BPT	Visible emissions shall not exceed an opacity of 20 percent on a six (6) minute block average basis, for more than one (1) six (6) minute block average in a 1-hour period.

(35) The licensee is subject to the following State regulations listed below.

Origin and Authority	Requirement Summary
Chapter 102	Open Burning
Chapter 109	Emergency Episode Regulation
Chapter 110	Ambient Air Quality Standard
Chapter 116	Prohibited Dispersion Techniques

(36) Any document (including reports) required by this license must be signed by a responsible official. [MEDEP Chapter 140]

(37) The term of this license shall be five (5) years from the signature date below.

DONE AND DATED IN AUGUSTA, MAINE THIS DAY OF 1999.

DEPARTMENT OF ENVIRONMENTAL PROTECTION

BY: _____
EDWARD O. SULLIVAN, COMMISSIONER

PLEASE NOTE ATTACHED SHEET FOR GUIDANCE ON APPEAL PROCEDURES

Date of initial receipt of application _____ October 28, 1996

Date of application acceptance _____ October 28, 1996

Date filed with Board of Environmental Protection _____

This order prepared by Sarah Anderson, Bureau of Air Quality